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LATHAM & WATKINS LLP

July 18, 2023

VIA ECF

The Honorable Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

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RE: *pulseData, Inc. v. Jung Hoon Son.*
C.A. No. 1:23-cv-03653-JMF

Dear Judge Furman:

To reduce the burden on this Court and the parties in view of a potential settlement, the parties in the above-referenced matter jointly write to request an extension of the submission of a discovery plan as required by Fed. R. Civ. P. 26(f) until 14 days after the settlement conference with Judge Moses, currently scheduled for Tuesday, August 22, 2023 at 2:15pm ET, and a corresponding extension for a Fed. R. Civ. P. 16(b) Scheduling Order. Both the discovery plan and the scheduling order would thus be due on September 5, 2023. The original due date of the discovery plan is Monday, July 24, 2023 and the Scheduling Order is Monday July 31, 2023. There have been no previous requests for extension.

Respectfully submitted,

/s/ Steven J. Pacini
Steven J. Pacini (admitted *pro hac vice*)
Of Latham & Watkins LLP
Counsel for Plaintiff

cc: Counsel of Record (via E-Filing)